

RAMAR D. BROWN
REG. NO. 19116-045
FCI SCHUYLKILL
FEDERAL CORR. INSTITUTION
P.O. BOX 759
MINERSVILLE, PA 17954

May 10, 2021

Clerk, U. S. District Court
Western District of Missouri
Kansas City - Western Division
400 East Ninth Street
Kansas City, MO 64106

RE: *Brown v. United States*
Civil No. 4:20-cv-00326-BCW
Crim No. 4:06-cr-00175-BCW-2

To the Clerk of the Court:

Enclosed please find and accept for filing Defendant's Motion for Extension of Time to File Reply To Government's Response in Opposition to Defendant's Pro Se Motion for Compassionate Release Pursuant to 18 U.S.C. § 3582(c)(1)(A)(i). Please submit this motion to the Court.

Thank you for your assistance in this matter.

Sincerely,



RAMAR D. BROWN
Appearing *Pro Se*

Encl. as noted

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

No. 06-00175-02-CR-W-BCW

RAMAR D. BROWN,

Defendant.

**MOTION FOR EXTENSION OF TIME TO FILE REPLY TO GOVERNMENT'S
RESPONSE IN OPPOSITION TO DEFENDANT'S PRO SE MOTION FOR
COMPASSIONATE RELEASE PURSUANT TO 18 U.S.C. § 3582(c)(1)(A)(i)**

COMES Defendant, Ramar D. Brown ("Brown"), appearing *pro se*, and files his Motion for Extension of Time to File Reply To Government's Response in Opposition to Defendant's Pro Se Motion for Compassionate Release Pursuant to 18 U.S.C. § 3582(c)(1)(A)(i), and would show as follows:

I. PRELIMINARY STATEMENT

As a preliminary matter, Brown respectfully requests that the Court be mindful that "a *pro se* complaint should be given liberal construction, we mean that if the essence of an allegation is discernible ... then the district court should construe the complaint in a way that permits the layperson's claim to be considered within the proper legal framework." See *Solomon v. Petray*, 795 F.3d 777, 787 (8th Cir. 2015); *Estelle v. Gamble*, 429 U.S. 97 (1976) (same); and *Haines v. Kerner*, 404 U.S. 519 (1972) (same).

II. REASON FOR EXTENSION

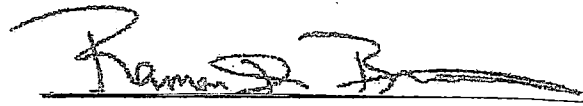
Brown has just received the GR through the prison mail at Schuylkill FCI. Because of the Covid-19 virus, there has been lack of movement on the prison compound and very limited access

to the law library so that Brown may research, prepare and perfect his Reply to the GR. As such, Brown seeks a thirty (30) day extension of time up to and including June 9, 2021, in which to file his Reply to the GR. This is Brown's first motion for an extension of time.

WHEREFORE, premises consideration, Brown prays that the Court grant this motion, and grant a thirty (30) extension of time, up to and including June 9, 2021, in which to file his Reply to the GR.

Respectfully submitted,

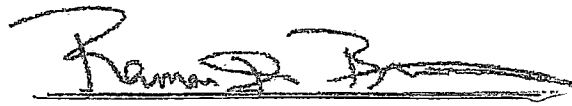
Dated: May 10, 2021.



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CERTIFICATE OF SERVICE

I hereby certify that on May 10, 2021, I sent via U. S. Mail, postage prepaid, a true and correct copy of the above and foregoing Motion for Extension of Time to File Reply To Government's Response in Opposition to Defendant's Pro Se Motion for Compassionate Release Pursuant to 18 U.S.C. § 3582(c)(1)(A)(i) to Matthew P. Wolesky, Assistant United States Attorney at 400 East 9th Street, Room 5510, Kansas City, Missouri 64106.



RAMAR D. BROWN